

PL Sum. J.

Ex. 042



Transcript of Michelle Wehrle 30(b)(6)

Tuesday, August 9, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 119555

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

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W.K., E.H., M.M., R.P., M.B., D.P., :
A.F., C.A., R.K., K.P., and T.H., :
Plaintiffs, : CIVIL ACTION
vs. : FILE NO.
RED ROOF INNS, INC., FMW RRI, : 1:20-CV-
NC, LLC, RED ROOF FRANCHISING, LLC, : 5263-MHC
RRI WEST MANAGEMENT, LLC, VARAHI :
HOTEL, LLC, WESTMONT HOSPITALITY, :
ET AL., :
Defendants. :

-----X
JANE DOE 1-4, : CIVIL ACTION
Plaintiffs, : FILE NO.:
vs. : 1:20-CV-
RED ROOF INNS, INC., et al., : 04278-WMR
Defendants. :

-----X
30(b)(6) VIDEOTAPED DEPOSITION OF MICHELLE WEHRLE
Tuesday, August 9, 2022
9:05 a.m.

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Videotaped deposition of MICHELLE

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WEHRLE, was held remotely via Zoom

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videoconference, commencing at 9:05 a.m., on

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Tuesday, August 9, 2022, and taken down

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stenographically by Elizabeth Mingione, Certified

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and Registered Professional Reporter for the State

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of Georgia.

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23 Job No.: 119557

24 Pages: 1 - 170

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22 Nicholas Kolitsos, Esquire

23 Amy LaGala, Videographer

24 Beth Richards, Paralegal

25

1 Q. So you reviewed another entity's
2 training. Did you actually attend or partake in
3 any training on preventing human trafficking or
4 sex trafficking?

5 A. Nothing other than the training from
6 American Hotel and Lodging.

7 Q. And, Ms. Wehrle, do you have any
8 background or experience in preventing human
9 trafficking or sex trafficking?

10 A. No, I do not.

11 Q. Are you aware of anyone else at Red
12 Roof at this time that had background or
13 experience in preventing human trafficking or sex
14 trafficking?

15 A. No, I do not.

16 Q. I believe you testified earlier that
17 this training presentation was first offered to
18 managers around August of 2014, correct?

19 A. Yes.

20 Q. And that was just the managers of
21 corporate locations, correct?

22 A. It was mandatory for the corporate
23 managers to take this training. And it was
24 offered as optional for franchise properties to
25 take.

1 Q. And when was this offered as optional
2 training to franchise locations?

3 A. The same time, August of 2014.

4 Q. And then around January of 2015 this
5 training was offered to employees at corporate
6 locations, correct?

7 A. Yes.

8 Q. And was it mandatory for employees at
9 corporate locations?

10 A. Yes.

11 Q. At that time was it also offered to
12 employees of franchise locations?

13 A. No, it was not.

14 Q. In August 2014 you said this training
15 was mandatory for managers of all corporate
16 locations. What steps did Red Roof take to ensure
17 that all managers underwent this training?

18 A. When the training was given, we would
19 keep track of attendance, and I cross-referenced
20 the attendance list with a list of managers at the
21 company locations. And if a manager did not
22 attend from a company location, I contacted the
23 vice president of operations, informing them that
24 John Doe from Property One, as an example, did not
25 attend this training.

1 learning.

2 Q. And who was that?

3 A. Her name was Vicky Houston.

4 Q. Was this training mandatory for
5 managers at corporate locations?

6 A. Yes.

7 Q. Was this training mandatory for
8 employees at corporate locations?

9 A. Yes.

10 Q. If you'll scroll down to the next page,
11 please. The first paragraph there says: This is
12 an extremely important topic that owners, in-level
13 management and employees need to receive training
14 on, correct?

15 A. Yes.

16 Q. But this was not mandated for franchise
17 location owners, managers or employees, correct?

18 MR. ALLUSHI: Objection.

19 MR. NOVAY: Objection. Asked and
20 answered.

21 A. Yes.

22 Q. And the next sentence says this -- the
23 videos will not be translated into Spanish,
24 correct?

25 A. Correct.

1 Q. And Red Roof knew that it had staff
2 members whose primary language was Spanish,
3 correct?

4 MR. ALLUSHI: Objection.

5 MR. NOVAY: Objection.

6 A. Yes.

7 Q. Was this material translated into
8 Spanish for employees at corporate location?

9 A. No.

10 Q. Did Red Roof track whether owners --
11 strike that.

12 Did Red Roof track whether in-level
13 management reviewed this material with employees
14 that do not understand the English language?

15 A. I do not know.

16 MR. ALLUSHI: Objection.

17 A. I do not know.

18 Q. Thank you. How did this training
19 differ from the training presentation that was
20 being utilized prior to this time?

21 A. In this particular training, there was
22 video of individuals who actually were being
23 trafficked. So it was providing a real-life
24 example of what they went through, what they were
25 feeling, and how they escaped or left that

1 UNITED STATES OF AMERICA)

2 ss:

3 STATE OF GEORGIA)

4 I, ELIZABETH MINGIONE, a Certified
5 Court Reporter in and for the State of Georgia, do
6 hereby certify:

7 That the witness whose deposition is
8 hereinbefore set forth was duly sworn, and that
9 the within transcript is a true record of the
10 testimony given by such witness.

11 That said deposition was taken before
12 me at the time and place set forth and was taken
13 down by me in shorthand and thereafter reduced to
14 typewritten transcription under my direction and
15 supervision.

16 I further certify that I am not related
17 to any of the parties to this action by blood or
18 marriage, and that I am in no way interested in
19 the outcome of this matter, financially or
20 otherwise.

21 IN WITNESS WHEREOF, I have hereunto set
22 my hand this 22nd of August, 2022.

23



24

Elizabeth Mingione, RPR

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Georgia CCR No. 5086-2568-4162-1504